

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

ERIN WILSON, individually and on behalf of all others similarly situated,	:	CIVIL ACTION FILE NO. 1:25-cv- 03237-TRJ
Plaintiff,	:	
	:	
v.	:	
	:	
COOKUNITY LLC	:	
	:	
Defendant.	:	
	:	
	/	

PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff respectfully submits this notice of supplemental authority to alert the Court to *Wilson v. Medvidi, Inc.*, 2025 WL 2856295 (N.D. Cal. Oct. 7, 2025), a decision issued earlier this week that bears on the pending motion to dismiss in this case. A copy is attached as Exhibit 1.¹

Medvidi holds that “a ‘telephone call’ as used in 47 U.S.C. § 227(c) encompasses … text messages.” Id. at *4. The court explained that the proper analysis “looks to the plain meaning of the text rather than the specific facts or technology that Congress may have had in mind in 1991 at the time of the TCPA’s passage.” Id. at *2 (citing *Oncale v. Sundowner Offshore Servs., Inc.*, 523 U.S. 75, 79 (1998)). The opinion further emphasizes that “the purpose and structure of the

¹ The Court granted the motion to dismiss with leave to amend on unrelated issues.

TCPA” make “clear that Congress was more concerned with the purpose of the telephone communications it proscribed … than the form in which those communications are transmitted.” Id. at *3.

The decision also rejects arguments that the absence of the term “text message” in the 1991 statute precludes application of § 227(c), and it rejected the contention that “call” could bear one meaning in § 227(b) and a different one in § 227(c). Instead, the Court concluded that the plain meaning of the statute, as understood by consumers, the FCC, and courts since the TCPA’s passage, supports treating text messages as “calls” within § 227(c). Id. at *3–4.

Accordingly, *Medvidi* provides direct and persuasive support for Plaintiff’s position that the TCPA’s Do Not Call provisions apply to the unwanted text messages at issue in this case.

Dated: October 11, 2025

/s/ Anthony Paronich

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CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

/s/ *Anthony Paronich*
Anthony Paronich

Dated: October 11, 2025